

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0599

Comment submitted by W. W. Miller

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## Submitter Information

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### General Comment

I am the second of three generations that have farmed our land in Spotsylvania County, Virginia since the mid forties and I am greatly concerned of the direction that is being taken on cleaning up the Chesapeake Bay.

People that earn their living off the soil are committed to environmental stewardship. We need and want good soil and clean water. This past winter I had a small acreage timbered and the logger made sure that he complied with and used the proper best management practices. On our farm we totally use 100% no-till when planting any crop. It has been years since we worked any ground or left any ground exposed. We have fenced our cattle out of the creeks and ponds. We follow our nutrient management plan and do not over apply nutrients. Many of the best management practices that we have utilized and installed on our farm have been done without cost share monies from the state.

The economic impact of new regulations to the farmer comes at a time when farmers are already struggling just to continue with their commitment to the land

It has come to light that the Chesapeake Bay Model, which is the model that EPA is using for their basis for nutrient and sediment reductions, has been shown to have extensive flaws in the data it utilizes. Even EPA has acknowledged this. EPA should not continue with costly mandates that are based on flawed information. Federal actions need to be based on accurate information.

If you have any questions please feel free to contact me.

Wayne W. Miller